

Chollas Creek Dissolved Metals TMDLs Implementation Plan
Comments from October 6 and December 15, 2008, and March 30, 2009 Stakeholder Meetings

NOTE: The Table below provides a running list of the comments received to date. As the workshop process to develop the Implementation Plan nears completion, the comments and discussion received during the workshops will be inserted into the Implementation Plan.

COMMENT DATE	COMMENT	STATUS OF RESPONSE TO COMMENT	RESPONSE
Comments from October 6, 2008 Stakeholder Meeting:			
10/6/2008	Include an Appendix as a bibliography	Complete	A Bibliography will be provided in Appendix A.
10/6/2008	Stakeholders recommended that the schedule indicate the activities for each Discharger. It was suggested that the Cities of Lemon Grove and La Mesa may be able to present the Plan to City Council in May, rather than in March.	Complete	The City has revised the Schedule to reflect this comment.
10/6/2008	The basis for the proposed monitoring locations will be presented in the Monitoring Plan.	Complete	The basis for the monitoring approach will be provided on the Monitoring Plan. The location of the grab samples is based on the Priority Sector approach and landuse in each Sector. The sector approach is defined in the Implementation Plan. All sites are subject to a field recon and will have to be rotated on information gained each year. The GPS coordinates have been provided in the Monitoring Plan.
10/6/2008	Is LG-1 impacted by contaminated groundwater from underneath the landfill and Chollas Heights Reservoir (Chollas Lake)?	Pending. Response to this issue will be provided at a future meeting.	This issue will be discussed with the City of San Diego Environmental Services Department (George Morton for Chollas Monitoring Reports). The location of the grab samples may consider specific source issues.
10/6/2008	Monitoring Plan should have at least 1 site, preferably 2 sites, below the mass loading stations in industrial area at the mouth of Chollas.	Complete	Source assessment samples will be collected. There will be at least one grab sample location downstream of the MLS. See Revised Monitoring Plan.
10/6/2008	Stakeholders also recommended conducting grab sample monitoring at: Auburn Creek and 51st Street Canyon.	Complete	See Revised Monitoring Plan. Grab sample will be collected at one location the first year and the other location the second year. Grab sample locations have been selected based on the Priority Sector approach and landuse in each Sector.
10/6/2008	Stakeholders recommended including chlordane as an analyte (pesticides).	Complete	Incorporated.
10/6/2008	Stakeholders recommended integrating the Implementation Plan and Plan components into annual Budget(s) and receive approval from Council(s).	Complete	So noted. Bugets and council approval processes are discussed during internal planning meetings, as necessary.

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10/6/2008	Stakeholders recommended possible Tier I or Tier II activities including: 1) Ordinance changes to limit the use of items like material that present high pollutant loading potential to receiving waters (e.g. zinc fencing) and 2) higher frequency inspections of commercial and industrial businesses.	Complete	Activities recommended by stakeholders have been added to the activity list, or if activity already existed, notes have been added. Item 1 falls under the category of Tier I "Code Modification" and/or "Product Substitution" activities. Item 2 falls under the category of Tier I "Targeted Facility Inspections" activities. See Table C-1 (tool C) and related sections in subsequent Tools.
10/6/2008	Should sediment samples be added to the monitoring regime (for synthetic pyrethroids and chlorodane)?	Complete	The monitoring plan is designed to address the current TMDL and focus on the water based TMDLs (diazinon, dissolved metals, and bacteria). Sediment is outside the scope of the TMDL, therefore no sediment monitoring will be incorporated at this time. BMPs will however take an integrated approach.
10/6/2008	Should monitoring sites under the TMDL Compliance Monitoring include trash monitoring?	Complete	The City of San Diego assesses Trash under its current program. The Monitoring Plan currently has no provisions to collect trash data at any of the sites other than SD8(1) and DPR(2).
10/6/2008	Design Storm Determination	Pending. To be incorporated in 2nd Draft	The design storm assessment will be incorporated into the Plan following the completion of the ongoing analysis. The design storm analysis had to be extended into this wet season due to the dry conditions of last season. Additional monitoring is planned pending storm events. Once the analysis is completed, recommendations on the design storm will be provided.
10/6/2008	Why was the San Diego Unified School District not included in the TMDL? Dischargers should contact the Regional Board with this question.	Complete	SDUSD was contacted and participated in the November 2008 Discharger meeting. Grossmont and Lemon Grove schools will be invited to participate in future Discharger meetings. In addition, the dischargers contacted the Regional Board on December 1, 2008. Their response will be provided.
10/6/2008	How is implementation plan to be implemented using the tools? (require flow chart)	Complete	A flow chart was created highlighting the activity selection process. The flow chart and supporting documents will be posted to the stakeholders web-site.

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10/6/2008	Implementation Plan should include several project examples based on the recommendations from the stakeholder group.	Complete	Tier I, Tier II, and Tier III examples have been completed for three different dischargers. These examples have been incorporated into a powerpoint presentation - for discussion purposes only. This will be presented to stakeholders at the next meeting. A more completed summary of planned BMPs for the initial phase I of implementation will be presented by the City.
Comments from December 15, 2008 Stakeholder Meeting:			
12/15/2008	Coastkeeper requested that the dry weather data from their monitoring program be included as part of the overall TMDL water quality assessment.	ongoing	These data may be presented in the TMDL's annual reports as third party data.
12/15/2008	Coastkeeper commented that not all pollutant sources in La Mesa have been addressed by the current proposed monitoring locations.	ongoing	The proposed grab sample sites are temporary and therefore can be moved to cover more space/sources, such as areas in La Mesa. These areas will be considered for sampling each year as new sampling sites are selected. A more detailed response will be provided at the February stakeholder meeting.
12/15/2008	The County suggested that the group should consider whether jurisdictional activities required of those dischargers co-permitted under the Municipal NPDES Permit should be included in the lists of Discharger-specific activities? For example, street sweeping is also a jurisdictional activity required by the Municipal Permit and would achieve a level of load reduction. The group generally agreed that these jurisdictional, or "baseline" activities should be listed.	ongoing	Dischargers to meet and discuss how to incorporate jurisdictional programs. Preliminary discussion at the meeting suggested including a separate sub-section to the activities table in Appendix C that is specific to jurisdictional activities and/or identified them as "baseline" activities. The level of assessment for the baseline activities would not be as great as the targeted activities that provide an incremental reduction in pollutant loading.
12/15/2008	Coastkeeper recommended adding the cost of projects to the General List of Activities.	Complete	Appendix C (Activity Lists) will be modified to include a cost column for implementation costs.

Comments from March 30, 2009 Stakeholder Meeting:			
COMMENT DATE	COMMENT	STATUS OF RESPONSE TO COMMENT	RESPONSE
3/30/2009	Open space preservation projects (restoration) should always have a community education link/component.	Comment Noted.	The City of San Diego incorporated an educational signage component into the Southcrest Park Watershed Activity City 14-2. The public participation process of the City of San Diego Sustainable Canyon's project will also incorporate community input and communication as the conceptual design is completed. This is already a component of the Port of San Diego's Chollas Creek Restoration project. Dischargers will incorporate Education and Outreach, as feasible into future restoration projects.
3/30/2009	The Restoration project at Southcrest Park should extend from adjacent to the park entrance to the foot bridge. The contrast between restored and non-restored areas will help improve neighborhood "ownership" and provide a strong visual education/outreach message.	Complete.	The City of San Diego's project concept description has been updated to reflect this comment will be considered during design. See Appendix B-3, City of San Diego, Watershed Activity City 14-2.
3/30/2009	Water reuse should be incorporated into restoration and large LID-type projects as much as possible.	Comment Noted.	This comment will be considered as Dischargers proceed with implementation.
3/30/2009	Park and recreation projects and storm water projects should be considered together through a master planning effort.	Complete.	The Chollas Creek Watershed Stakeholders and the City of San Diego have prepared a master plan for the restoration of Chollas Creek, called the Chollas Creek Enhancement Plan (Plan). Any future creek restoration projects implemented by the City of San Diego will be designed according to the Plan.
3/30/2009	The City of Lemon Grove should review the LID/stormwater policies implemented in other Cities or Countries.	Comment Noted.	
3/30/2009	The City of San Diego should explore opportunities to partner with the Coastal Conservancy and/or other agencies who may be able to provide grant funding.	Complete.	The Dischargers will continue to explore opportunities for grant funding to support implementation efforts.
3/30/2009	Dischargers should pursue opportunities for data sharing and/or project collaboration with regional and watershed stakeholders.	Comment Noted.	Dischargers will continue discussions with stakeholders on coordination opportunities and mechanisms.
3/30/2009	Dischargers should coordinate with other watershed stakeholders and efforts who are creating a web-based tool for coordinating efforts and sharing information regarding data/reports and new projects.	Comment Noted.	Dischargers will continue discussions with stakeholders on coordination opportunities and mechanisms.
3/30/2009	Dischargers should open communication with the Chollas Creek Project Implementation Group.	Comment Noted.	Several Discharger agencies currently attend these meetings and will provide communication with other Dischargers.
3/30/2009	The City of San Diego should evaluate trash collection activities as a potential source of trash.	Comment Noted.	The City of San Diego will consider this concept during ongoing and future Community Based Social Marketing (CBSM) efforts regarding trash.